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17 *Attorneys for Defendants/Counterclaim*
18 *Plaintiffs BrandTotal, Ltd. and Unimania,*
19 *Inc.*

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO/OAKLAND DIVISION

23 FACEBOOK, INC., a Delaware
corporation,

24 Plaintiff,
25 v.

26 BRANDTOTAL, LTD., an Israeli
corporation, and
UNIMANIA, INC., a Delaware
corporation,

27 Defendants.

28 Case No.: 3:20-CV-07182-JCS

ADMINISTRATIVE MOTION OF
DEFENDANTS BRANDTOTAL, LTD.
AND UNIMANIA, INC. TO FILE REPLY
UNDER SEAL

Judge: The Hon. Joseph C. Spero
Ctrm.: Courtroom F – 15th Floor
Date: October 26, 2020
Time: 2:00 PM

1 Pursuant to Civil L.R. 7-11 and Civil L.R. 79-5, Defendants/Counterclaim Plaintiffs
 2 BrandTotal, Ltd. and Unimania, Inc. (“BrandTotal”), by and through undersigned counsel,
 3 respectfully move for administrative relief to file its unredacted Reply in Support of its Ex Parte
 4 Motion for Temporary Restraining Order under seal, along with the supporting Declaration of
 5 Alon Leibovich, and Exhibit P to also be filed under seal.

6 BrandTotal will publicly file redacted versions of the Reply and supporting documents
 7 contemporaneously with the filing of this Motion.

8 Good cause exists for sealing of these documents. Information cited in the memorandum
 9 and supporting documents reference BrandTotal’s confidential information, which if made public
 10 would adversely impact BrandTotal.

11 The proposed sealing is narrowly tailored and only seeks to protect those limited portions
 12 of the memorandum and supporting documents that contain sensitive financial and customer
 13 identification information, which, if made public, would adversely impact both BrandTotal *and*
 14 its customers. Because this is a motion for temporary restraining order, the law requires
 15 Defendant BrandTotal to explain the irreparable harm it is experiencing in specific detail, which
 16 necessarily involves highly sensitive information.

17 No less restrictive means exist to achieve the overriding interest of protecting this
 18 information. In absent of an order sealing BrandTotal’s sensitive financial information and
 19 references to the names of BrandTotal’s customers, BrandTotal’s interests would be seriously
 20 prejudiced.

21 This Administrative Motion to File Under Seal is accompanied by the supporting
 22 Declaration of Rudolph A. Telscher, Jr. and a [Proposed] Order Granting BrandTotal’s
 23 Administrative Motion to File Under Seal. Pursuant to Civil L.R. 79-5, BrandTotal lodges the
 24 Requested Sealed Documents with this Court and respectfully requests leave to file them under
 25 seal.

1 Date: October 22, 2020

Respectfully submitted,

2 By: /s/ Rudolph A. Telscher, Jr.

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25 ***Attorneys for Defendants BrandTotal, Ltd. and***
Unimania, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2020, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record, and to be served via email on all counsel of record at the following:

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